



# NATIONAL ASSOCIATION OF THE DEAF

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February 12, 2002

Federal Communications Commission  
Office of the Secretary  
Room TW-A325  
445 Twelfth Street SW  
Washington, DC 20554

**Re: WT Docket 01-309. Reply Comments**  
Section 68.4(a) of the Commission's Rules  
Governing Hearing-Aid Compatible Telephones

Dear Ms. Salas:

The National Association of the Deaf (NAD) appreciates this opportunity to submit reply comments on the Commission's Notice of Proposed Rulemaking (NPRM) to re-examine exemptions for public mobile phones pursuant to the Hearing Aid Compatibility (HAC) Act of 1988.

Established in 1880, the NAD is the nation's oldest and largest consumer-based national advocacy organization safeguarding the civil and accessibility rights of deaf and hard of hearing individuals in the United States of America. Policy and legislative issues addressed by the NAD cover a broad range of areas, including education, employment, health care, human services, rehabilitation, telecommunications, and transportation.

In our January 11, 2002, comments, we stressed that digital cell phones are becoming central to the everyday lives of millions of Americans. Such phones offer most people low-cost or "free" long distance. They also provide a wealth of information services. That is why the NAD was disappointed to see that the Cellular Telecommunications & Internet Association (CTIA), in its January 11, 2002 comments, objected that requiring digital cell phones to be HAC would create "a significant disruption in the current design and manufacturing process of digital wireless phones" (p. 8). That wording suggested that, notwithstanding CTIA's repeated assurances that the industry "continues to work diligently" (p. 1), many industry members apparently are not taking HAC seriously. The NAD applauds HAC digital cell phones from Nokia, Samsung, and others who *do* take the issue seriously. Their success begs the question: why does CTIA insist that what those companies are already doing would be a "significant disruption" to others in the industry?

The work of Nokia, Samsung, Motorola and others clearly shows that HAC *is feasible*.

The NAD believes that our comments, plus those of Self Help for Hard of Hearing People (SHHH) and others have demonstrated that Americans who use hearing aids or cochlear implants are disadvantaged by non-HAC of digital cell phones. We believe, therefore, *that revoking the exemption is in the public interest*.

One final note: In our January 11, 2002 comments, the NAD inadvertently made a reference to Ericsson. This reference was in error. We wish to officially retract this reference, which appeared on page two of our comments. We apologize to Ericsson for the mis-statement.

Thank you for taking the reply comments of the NAD into consideration.

Sincerely,

A handwritten signature in black ink, reading "Nancy J. Bloch". The signature is fluid and cursive, with a long horizontal flourish extending from the end of the name.

Nancy J. Bloch  
Executive Director